

ORIGINAL SEALEDIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

DAVID BIAS (01)
RAYMOND GROSS (02)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED

OCT - 5 2021

CLERK, U.S. DISTRICT COURT
By Deputy **M3**

FILED UNDER SEAL

NO.

3 - 21 CR 0500 - B**GOVERNMENT'S MOTION TO SEAL INDICTMENT**

The United States of America ("the government"), by and through the United States Attorney for the Northern District of Texas, moves for an order sealing the Indictment returned by the grand jury in the above-captioned criminal case.

The government requests that the indictment remain sealed until such time as the defendants named in the Indictment are apprehended and make an initial appearance in federal court, or until further order of the Court. The government believes that the public release of the name of the defendant who has not been apprehended would undermine the pursuit of justice and possibly allow the defendant who has not been apprehended to flee, destroy evidence, or obstruct justice. The government, however, requests that it be allowed to provide any apprehended defendant with a copy of the indictment.

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[NO FURTHER INFORMATION ON THIS PAGE]

Respectfully submitted,

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ACTING UNITED STATES ATTORNEY



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